



Ian Sibley BSc MRICS,
Island Architects,
Porthcressa,
St Marys,
Isles of Scilly TR21 0JQ.

Ref: Bunkabins, Bryher Boatyard
Date: 13th March 2025

Dear Ian,

Overview

The habitats within the proposed temporary location of the bunkabins on the Bryher Boatyard site are currently a mosaic of bare ground and sparse, species-poor ephemeral grassland. The location is an existing yard where boats are stored through the winter and the degree of long-term storage coupled with frequent movements of heavy machinery results in very little established or long-term vegetation within the area.

Limitations and Notes

A smaller than standard Minimum Mapping Unit (MMU) was used in this assessment in order to ensure that the characterisation of habitats is proportionate to the scale of the site and the potential impact.

Areas which are included within the redline but which would not be directly or indirectly impacted by the proposals are mapped and described. It is of note that sand dune habitats are present within the redline boundary; however these would not be impacted and are simply in proximity to the proposed development. Usually the inclusion of this habitat within the redline would not permit the use of the Small Site Metric (SSM), instead requiring the use of the full metric. However in this instance, the SSM is completed to demonstrate that the project would qualify for the *de minimis* exemption – see below – and therefore the SSM is considered appropriate in this instance as the key consideration is the quantum of impact rather than the detailed calculation of unit change.

Biodiversity Net Gain

Following on from the assessment of the proposed development at the above referenced address, I would consider that the project meets the necessary exemptions criteria under the provisions of Regulation 4 of The Biodiversity Gain (Exemptions and Other Matters) (England) Regulations 2024 (SI 2024/47).

The Regulations state that:

“The biodiversity gain planning condition does not apply in relation to planning permission for development which meets the first and second conditions:

- 1) The first condition is that the development does not impact an onsite priority habitat.*
- 2) The second condition is that the development impacts:
 - a) less than 25 square metres of onsite habitat that has biodiversity value greater than zero; and*
 - b) less than 5 metres in length of onsite linear habitat.”**

The first criteria is met as no priority habitats would be impacted. This is confirmed by the ecologist and can be verified through reference to the supporting documentation provided in the Small Site Metric (SSM) which accompanies this letter.

The second criteria is met as follows:

- a) The total area of onsite habitat impacted by the proposals which has a biodiversity value greater than zero is **8 sqm** which is below the 25 sqm threshold required to qualify for the exemption. This is demonstrated in the SSM. Whilst precision of mapping cannot be perfect given the small scale of the development and the ecotones between areas of ephemeral sward, disturbance and compaction; the area was carefully assessed and confirmed to fall below the 25 sqm on site.
- b) No linear habitats would be impacted by the proposals – the non-native karo hedgerows would remain in situ aside from potentially a negligible degree of removal for the link to the septic tank which, if required, would fall well below the 5m specified in the criteria b.

This assessment therefore concludes that the proposed temporary development would be exempt from the Biodiversity Net Gain requirements on the basis of its compliance with the *de minimis* exemption.

The Baseline and Proposed habitat maps are appended to this letter. If you or the Planning Authority require any further information or supporting evidence in relation to this project, I would be happy to provide this.

Bats

No suitable features for use by roosting bats were recorded on site.

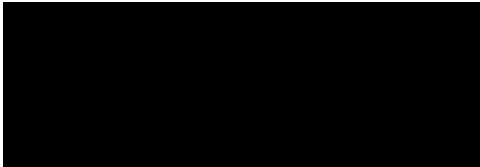
Nesting Birds

The site within the overall redline does offer suitable nesting habitat for breeding birds but not within the area of habitat to be impacted during works.

Care should be taken during works beside the boundary karo hedgerows to ensure that no birds are present when these actions are undertaken.

If any minor impacts to the karo hedges are required for the septic tank link, contractors should visually inspect the work area first in order to confirm that no nests are present. In the event that a birds nest is present, it must be left undisturbed until chicks have fledged the nest, at which point works can proceed.

Yours sincerely,



James Faulconbridge BSc (Hons), MRes, MCIEEM
IOS Ecology, St Martin's, Scilly.

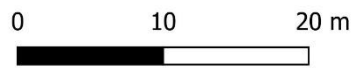
Key - Baseline

HEDGEROWS

— Non-native and ornamental hedgerow

HABITATS

- ▨ Artificial unvegetated, unsealed surface
- ▨ Coastal sand dunes
- ▨ Developed land; sealed surface
- ▨ Introduced shrub
- ▨ Other neutral grassland
- ▨ Vegetated garden



Key - Proposed

HEDGEROWS

— Non-native and ornamental hedgerow

HABITATS

Artificial unvegetated, unsealed surface

Coastal sand dunes

Developed land; sealed surface

Introduced shrub

Other neutral grassland

Vegetated garden



Temporary siting of 2x bunkabins

